

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA**

RESOLUTE FOREST PRODUCTS, INC.,)	
RESOLUTE FP US , INC., RESOLUTE FP)	
AUGUSTA, LLC, FIBREK GENERAL)	CIVIL ACTION FILE
PARTNERSHIP, FIBREK U.S., INC., FIBREK)	NO. CV116-071
INTERNATIONAL INC., AND RESOLUTE FP)	
CANADA, INC.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
GREENPEACE INTERNATIONAL (aka)	
“GREENPEACE STICHTING COUNCIL”),)	
GREENPEACE, INC., GREENPEACE FUND,)	
INC., FORESTETHICS, DANIEL BRINDIS,)	
AMY MOAS, MATTHEW DAGGETT, ROLF)	
SKAR, TODD PAGLIA, AND JOHN AND)	
JANE DOES 1-20,)	
)	
Defendants.)	

DEFENDANTS’ MOTION TO STAY DISCOVERY

COME NOW Greenpeace International, Greenpeace, Inc., Greenpeace Fund, Inc., Forestethics, Daniel Brindis, Amy Moas, Matthew Daggett, Rolf Skar, and Todd Paglia, defendants in the above-captioned matter, and respectfully move this Court pursuant to Fed. R. Civ. P. 26(d) to stay all discovery in this action on the grounds set forth in the Memorandum of law accompanying this Motion.

This 29th day of July, 2016.

/s/ Thomas W. Tucker

THOMAS W. TUCKER
Georgia Bar No. 717975
Attorney for Defendants Greenpeace
International, Greenpeace, Inc., Greenpeace
Fund, Inc., Daniel Brindis, Amy Moas,
Matthew Daggett, and Rolf Skar

OF COUNSEL:

Davis Wright Tremaine, LLP
1919 Pennsylvania Avenue, NW
Washington, D.C. 20006-2401
(202) 973-4280 (telephone)
lisazycherman@dwt.com

/s/ Shaun M. Daugherty
SHAUN M. DAUGHERTY
Georgia Bar No. 205877
Attorney for Defendants ForestEthics and
Todd Paglia

COLES BARTON LLP
150 South Perry Street, Suite 100
Lawrenceville, Georgia 30046
(770) 995-5570
sdaughtery@colesbarton.com

CERTIFICATE OF SERVICE

This is to certify that on the 29th day of July, 2016, I have served all parties in this case in accordance with the directives from the Court Notice of Electronic Filing (“NEF”) which was generated as a result of electronic filing.

/s/ Thomas W. Tucker

THOMAS W. TUCKER

GA Bar No. 717975

Attorney for Defendants Greenpeace, Inc., Greenpeace Fund, Inc., Greenpeace International, Daniel Brindis, Amy Moas, Matthew Daggett, and Rolf Skar